

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **4:23-CR-159**
: **v.** : **(Chief Judge Brann)**
: **JOSHUA TAYLOR** : **(Electronically Filed)**

**MOTION FOR ENLARGEMENT
OF TIME TO FILE PRETRIAL MOTIONS
AND CONTINUANCE OF TRIAL**

AND NOW comes the Defendant, Joshua Taylor, by his attorney, Christopher Opiel, Esq., and files the following Motion for Enlargement of Time to File Pretrial Motions and Continuance of trial respectfully requesting the extend the time to file pretrial motions for at least one hundred twenty (120) days and to continue the trial in this matter in accordance with the pretrial motions date. In support thereof, it is averred as follows:

1. On June 13, 2023, Joshua Taylor was charged in an Indictment with: COUNT 1, conspiracy to knowingly, intentionally, and willfully unlawfully transport, transmit, and transfer in interstate commerce stolen goods, wares and merchandise, of the value of \$5,000 or more, knowing the same to have been stolen, converted, and taken by fraud in violation of 18 U.S.C. § 371; and COUNT 4, unlawfully transport, transmit, and transfer in interstate commerce stolen goods, wares and merchandise, of the value of \$5,000 or more, knowing the same to have

been stolen, converted, and taken by fraud in violation of 18 U.S.C. §§ 2314 and 2. (Doc. 1).

2. On June 14, 2023, Defendant was arraigned on the charges, and he entered a plea of “not guilty”. (Doc. 12).

3. The current deadline for the filing of pretrial motions is March 1, 2024. (Doc. 65).

4. Trial is currently scheduled to commence April 1, 2024. (Doc. 65).

5. The parties are currently in the discovery process.

6. The Government has disclosed approximately 600,000 documents in discovery to Undersigned Counsel so far, and the Government has indicated that it is preparing another 1,200,000 documents to disclose to the defense in the future.

7. Defendant has provided a hard drive to the Government for the additional 1,200,000 documents of discovery to be transferred to and the Government has indicated that the hard drive should be ready to be sent back to Defendant soon.

8. Defendant respectfully requests a continuance of the pretrial motions deadline and trial so that Defendant can receive and review discovery.

9. Undersigned Counsel contacted AUSA Sean A. Camoni, and AUSA Camoni indicated that the Government concurs in the within motion.

10. Undersigned Counsel contacted: Patrick A. Casey, Esq., counsel for codefendant, Cedric Lodge; Edward J. Rymsza, Esq., counsel for codefendant, Katrina Maclean; and Hope C. Lefeber, Esq., counsel for codefendant, Denise Lodge; and all counsel listed concur in this motion.

11. For the above stated reasons, the Defendant requests at least a one hundred twenty (120) day extension of time to file pretrial motions, and the trial to be continued in accordance with the deadline for pretrial motions.

12. It is respectfully submitted that failure to grant the extension would likely result in a miscarriage of justice and deny counsel for the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. §§ 3161(h)(7)(A) and (B)(i) and (iv).

WHEREFORE, the Defendant, respectfully requests that this Honorable Court grant the within motion and enlarge the time for the filing of pretrial motions for at least one hundred twenty (120) days and the trial to be continued in accordance with that date.

Respectfully submitted,

Date: February 6, 2024

/s/ Christopher Opiel
Christopher Opiel, Esq.
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CERTIFICATE OF SERVICE

I, Christopher Opiel, CJA appointed counsel, do hereby certify that this document, the foregoing **Motion for Enlargement of Time to File Pretrial Motions and Continuance of Trial**, filed electronically through the ECF system will be sent to the registered Participants as identified on the Notice of Electronic Filing, including the following:

Sean A. Camoni, Esq.
Assistant United States Attorney

Patrick A. Casey, Esq.,
Counsel for codefendant, Cedric Lodge

Edward J. Rymsza, Esq.,
Counsel for codefendant, Katrina Maclean

Hope C. Lefeber, Esq.,
Counsel for codefendant, Denise Lodge

Date: February 6, 2024

/s/ Christopher Opiel
Christopher Opiel, Esq.
CJA Appointed Counsel